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The Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1306
New York, New York 10007

By ECF and Email

November 20, 2015

Re: In re Lehman Bros. Holdings Inc., 15-cv-08052 (ALC)

Dear Judge Carter:

We represent Shield Securities Ltd. (*Shield*), in the above captioned action. Following up on our November 9, 2015 Letter (ECF No. 14), the parties have made good progress in finalizing settlement paperwork but have not yet completed the required documents. The parties jointly request that Shield be granted an extension to file its Reply in further support of its Motion for Leave to Appeal until Tuesday, December 15, 2015, so that the parties can complete the necessary paperwork to finalize the settlement and dismissal of this appeal and the underlying action in the Bankruptcy Court.

Shield's Reply was originally due on November 5, 2015. This is the third request for an extension of time with respect to this motion, and it is made jointly with LBSF. Accordingly, we respectfully request that the Court so-order the stipulation annexed hereto as Exhibit A which provides that Shield will file its Reply on December 15, 2015.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "David Livshiz", with a long horizontal flourish extending to the right.

David Livshiz

cc: Paul DeFilippo, Esq. (by email)
William F. Dahill, Esq. (by email)
Joanna Schorr, Esq. (by email)

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	x	
	:	Chapter 11
In re:	:	
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	
Debtors.	:	
_____	x	
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Adversary Proceeding
	:	No. 10-03547 (SCC)
BANK OF AMERICA NATIONAL ASSOCIATION,	:	
<i>et al.</i> ,	:	
Defendants.	:	
_____	x	
SHIELD SECURITIES LIMITED,	:	15-cv-08052 (ALC)
	:	
Appellant,	:	On Appeal from the United
	:	States Bankruptcy Court
-against-	:	for the Southern District of
	:	New York, Honorable
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:	Shelley C. Chapman,
	:	Adv. Pro. No. 10-03547
Appellee.	:	
_____	x	

STIPULATION

WHEREAS, the Bankruptcy Court entered the Order Concerning Shield Securities Limited (“Shield”)’s Motion to Dismiss for Lack of Personal Jurisdiction (the “Order”) (ECF No. 1148) on September 28, 2015;

WHEREAS, on October 5, 2015 Shield filed a Notice of Appeal (ECF No. 1);

WHEREAS, accompanying the Notice of Appeal, Shield moved for leave to appeal the Order (the “Motion”) (ECF No. 4), accompanied by the Memorandum of Law in Support of

Shield's Motion (ECF No. 6) and the Declaration of Shannon M. Leitner (ECF No. 5);

WHEREAS, on October 15, 2015, Lehman Brothers Special Financing Inc. ("LBSF") filed an unopposed letter motion extending the time for LBSF to file its Opposition to October 26, 2015 and Shield's time to file its Reply to November 5, 2015, which the Court so ordered on October 16, 2015 (ECF No. 8);

WHEREAS, on October 26, 2015, LBSF filed its Opposition to Shield's Motion for Leave to Appeal (ECF No. 10), along with the Declaration of William F. Dahill (ECF No. 11);

WHEREAS, on November 3, 2015, Shield filed an unopposed letter motion extending the time for Shield to file its Reply to November 10, 2015, which the Court so ordered on November 4, 2015 (ECF No. 13);

WHEREAS, on November 9, 2015, the parties reached a settlement in principle and on November 10, 2015, the Court so ordered an extension of time for Shield to file its Reply to November 24, 2015, to allow the parties to finalize the settlement paperwork;

IT IS HEREBY STIPULATED AND AGREED, by and between LBSF and Shield, by their respective undersigned counsel, as follows:


1. The deadline for Shield to file its Reply to LBSF's Opposition is hereby extended to December 15, 2015.

2. Shield reserves all rights and defenses it may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction (including, for the avoidance of doubt, objections to the

exercise of in personam jurisdiction over Shield and the exercise of in rem jurisdiction over the subject matter of this dispute).

Dated: November 20, 2015
New York, New York

FRESHFIELDS BRUCKHAUS
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*Attorneys for Appellant Shield Securities
Limited*

IT IS SO-ORDERED:

November __, 2015
New York, New York

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*Attorneys for Appellee Lehman Brothers
Special Financing Inc.*

HONORABLE ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE